

SEA LINK – EN020026

SUBMISSION FOR DEADLINE 3, 9th January 2026

Nicholas Bridges RIBA FRSA

RR ref 3944

IP ref [REDACTED]

CULTURAL HERITAGE – LANDSCAPE & VISUAL – CUMULATIVE DEVELOPMENT

Requests in ExQ1 – Comments in support

Landscape and Visual

1LVIA2- Good Design

1LVIA3 – Design and Landscape Strategy

1LVIA4 – Lighting

1LVIA7 – National Landscape duty

1LVIA11 – Heritage Coast

1LVIA12 – Visualisations

Cultural Heritage

1CH3 – Inclusion of heritage assets in the ES assessment

Cumulative effects (Inter-project)

1CEInter1 – Coordinated consideration of network projects

Summary / Introduction

1. My Relevant Representation raised concerns about the submitted DCO. The Applicant's document **REP2-024 9.43.6 (B)** on thematic and specific issues does not address any of the issues in my RR, despite NGET's claims to have addressed all comments from IPs. Neither do the Applicant's comments on Relevant and Written Representations including Open Floor Hearing 1, all of which include my contributions :
 - **EN020026-001736- 9.34.1 Applicant's comments on Relevant Representations identified by the ExA**
 - **EN020026-001876-9.34.6 (B) Applicant's Thematic Responses to Relevant Representations (Tracked Changes)**
 - **EN020026-001917-9.79 Applicant's Comments on Written Representations**
 - **EN020026-001878-9.71 Applicant's Written Response to Open Floor Hearing 2 KENT**
2. The ExA have echoed my points in the LVIA, CH and CEInter topics of their ExQ1 requests. This submission to the ExA in response provides further details relevant to the ExA's questions and to which the Applicant should respond for completeness.
 - I identified potential visual and heritage impacts on the Grade II listed St Botolph's Church, Iken, and the Grade II* Martello Tower CC, Slaughden which had not been assessed.

- The Applicant's ZTV provides evidence of the Proposed Project's visibility within the National Landscape, within the settings of listed buildings, within the Heritage Coast.
- The Areas of Search within both the Landscape & Visual and Cultural Heritage ES chapters were drawn too narrowly.
- The missing assessments of significance of the settings of heritage assets must follow Historic England's GPAN3 and those aspects of cultural heritage present within the landscape should be assessed as well in the LVIA.
- NGET have ignored the assessment of the high qualities of the S&EC&H NL AONB in a report it commissioned to mitigate existing harm to designated landscapes from electrical infrastructure, and to which it has committed £700m.
- The assessments of the settings of heritage assets and the S&EC&H NL AONB should follow the detailed guidance of Historic England and similar statutory constraints. The planning balance should follow the December 2025 EN-1's requirement to give great weight to any negative effects of the Project.
- The Cumulative Assessments in DCOs EN010077 and EN010078 did not include all effects of the Sea Link Proposed Project nor other projects known at the time. The same omission in the statutory processes must not recur in this DCO. Details of all the Cumulative Schemes should have been found and assessed.
- The Friston ExA concluded marginal ES compliance and borderline quality of the siting and design. As the Sea Link DCO is a repeat of the Friston DCOs, the additional harm of all the works for the Saxmundham converter stations will push the planning balance into negative.


ExQ1	Question to:	Question:
2. Landscape and visual		
1LVIA2.	Applicant	<p>Good design</p> <p>In terms of good design, NPS EN-1, for example paragraphs 4.7.11 and 4.7.12, identifies that the wider impacts of a development, including landscape impacts, are important factors in the design process. In terms of landscape and visual effects, paragraph 5.10.28 identifies that it may be appropriate to undertake landscaping off site, for example filling in gaps in existing tree and hedge lines. Paragraph 5.10.37 states that the Secretary of State should consider whether the development has been designed carefully, to minimise harm to the landscape, including by appropriate mitigation.</p> <p>Provide an explanation as to whether additional landscape planting could result in the mitigation of likely significant landscape and visual effects as identified in table 1.12 of [APP-048] and table 1.13 of [APP-061]. Provide an explanation as to why opportunities for mitigation of residual effects have not been pursued.</p> <p>Although significant adverse cumulative effects are identified in [APP-073] and [APP-060] for landscape and visual, no additional mitigation is identified. Provide an explanation of whether additional landscape planting could result in the mitigation of significant adverse landscape and visual effects. Provide an explanation as to why opportunities for mitigation of cumulative residual effects have not been pursued.</p>
1LVIA2.	N Bridges response	<p>Good Design</p> <p>3. The narrowness of the ES's Area of Search has constrained good design. NGET's proposed mitigation is also inadequate. National Grid have a very different ambition compared to the 2014 report Visual Impact Provision (VIP) it commissioned from Gillespies /Land Use Consultants to identify which parts of the England and Wales's electricity transmission infrastructure were causing harm to designated landscapes, where mitigation of landscape and visual harm was most needed, and would be most effective. £500m was set aside at the time for the whole of the UK for this mitigation which has recently been increased by £200m.</p> <p>4. The VIP focus was on transmission lines including other infrastructure such as substations and sealing end compounds where appropriate [1.9]. Lines outside but in reasonable proximity to designated landscapes were considered. The purpose of the VIP Report was to provide evidence to inform the stakeholder advisory group. The VIP's findings were as follows.</p> <p>5. The assessment methodology was based on GLVIA3. The common steps were:</p> <ul style="list-style-type: none"> • Defining an appropriate study area; • Identifying aspects affected by the transmission line; • Identify, list and describe the impacts; • Assess the importance of each impact;

ExQ1	Question to:	Question:																																						
		<ul style="list-style-type: none">Compare the levels of importance of each section of the line. <p>6. The main impacts on landscape and visual amenity were within 5km of the transmission line, and the most important ones often within 2km. The Tables below show the assessment scores of the SC&H AONB.</p>																																						
1LVIA2 continued	N Bridges response continued	<table><tr><th rowspan="2">DESIGNATED AREA</th><th rowspan="2">LINE SECTION CODE</th><th rowspan="2">SUB- SECTION CODE</th><th rowspan="2">IMPORTANCE OF LANDSCAPE IMPACTS</th><th colspan="7">IMPORTANCE OF VISUAL IMPACTS BY RECEPTOR GROUPS</th><th rowspan="2">OVERALL IMPORTANCE OF VISUAL IMPACTS</th><th rowspan="2">COMBINED LANDSCAPE AND VISUAL SCORE</th><th rowspan="2">LENGTH (km)</th><th rowspan="2">RANK</th><th rowspan="2">SCORE COLOUR CODE</th></tr><tr><th>Communities</th><th>Users of Trails and Cycle-ways</th><th>Users of Rights of Way and Open Access Land</th><th>Visitors to publicly accessible sites</th><th>Tourist Accommodation</th><th>Travellers on scenic routes</th></tr><tr><td>Suffolk Coasts & Heaths</td><td>4ZW / 4ZX</td><td>1</td><td>3</td><td>3</td><td>6</td><td>3</td><td>3</td><td>3</td><td>3</td><td>/</td><td>18</td><td>21</td><td>11.50</td><td></td><td></td></tr></table>	DESIGNATED AREA	LINE SECTION CODE	SUB- SECTION CODE	IMPORTANCE OF LANDSCAPE IMPACTS	IMPORTANCE OF VISUAL IMPACTS BY RECEPTOR GROUPS							OVERALL IMPORTANCE OF VISUAL IMPACTS	COMBINED LANDSCAPE AND VISUAL SCORE	LENGTH (km)	RANK	SCORE COLOUR CODE	Communities	Users of Trails and Cycle-ways	Users of Rights of Way and Open Access Land	Visitors to publicly accessible sites	Tourist Accommodation	Travellers on scenic routes	Suffolk Coasts & Heaths	4ZW / 4ZX	1	3	3	6	3	3	3	3	/	18	21	11.50		
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		<p>Figure 1. Table 3.1 – Assessment of Suffolk Coasts and Heaths AONB.</p> <p>Colour score RED = Very High (20+) overall visual</p>																																						
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		Table 3.4 – Ranked Assessment (minus accommodation and scenic routes) PREFERRED FINAL RANKING : 41 out of 101																																						

ExQ1**Question to:****Question:****1LVIA2
continued**N Bridges response
continued

VIP Report's Overhead line sub-section Assessment Score for Suffolk Coasts and Heaths AONB

ExQ1	Question to:	Question:
1LVIA2 continued	N Bridges response continued	<p>7. The VIP report notes for Sections 4ZW and 4ZX immediately west of Sizewell: <i>"Jointly judged to have combined landscape and visual impacts of moderate importance, albeit with individual impacts which are of high importance. High importance visual impacts have been identified affecting users of regional trails and cycleways in the AONB."</i></p> <p>Summary of the VIP mitigation options for S&EC&H AONB:</p> <p>8. <i>The reinforcement of existing woodlands and hedgerows could help to further screen views of the pylons, in particular providing appropriate mitigation for some viewpoints in close proximity to the lines. However, due to the flat nature of the landscape, it is likely that the tops of pylons would still be visible when the lines are viewed over a longer distance. Such planting and reinforcement might be achieved as part of wider landscape enhancements for those areas adversely affected by transmission lines that are in line with objectives in the AONB Management Plan.</i></p> <p>9. The VIP records a high ranking of the S&EC&H NL for its visual score. The section of transmission lines most in need of mitigation is that from Sizewell Power Station through the NL, then outside where Friston has consent to join them, and south west to Gromford. The importance identified in the VIP report for mitigating the existing effects of the pylons has not been assessed by the Applicant, nor have the Proposed Project's own mitigation measures been allied with National Grid's own.</p>
1LVIA2 continued	N Bridges response continued	<p>1LVIA2 Good Design The Rochdale envelope</p> <p>Application document EN020026-00231 6.2.1.5 Part 1 Introduction Chapter 5 – EIA Approach and Methodology</p> <p>10. Paras. 5.4.18 to 5.4.26 are an example of the Applicant's use of the Rochdale Envelope principles to postpone design decisions. The Applicant has not explained why and how it is not possible to specify and submit far more details of the Proposed Project. For the ES to be the most accurate, it needs sufficient design parameters applicable to the characteristics of the Proposed Project. These should be used in the assessment and those parameters likely to result in the maximum or medium adverse effects be identified.</p> <p>11. My RR Topic E – The use of the Rochdale Envelope drew attention to the information void by its unnecessary application to limit the character and appearance of the submitted design of the converter and substation sheds when the Applicant has explored and submitted so many options for co-location of converter stations in EN020026-000203-7.10 Coordination Document and form, colour and materials in EN020026-001621-7.11.1 Design Approach Document - Suffolk (Version B Tracked Changes). It is possible for the DCO Order to allow some variation of the precise location or height following construction detailing. But not the fundamental volumes, locations and appearance in the landscape.</p>

ExQ1	Question to:	Question:
<p>1LVIA2 continued</p>	<p>N Bridges response continued</p>	<p>12. It is inexplicable why the images in EN020026-000714-9.6.1 Appendix A Indicative cumulative visualisations of the National Grid and Scottish Power Renewables substations near Friston have modelled the plant with wirescape outside the converter sheds but this has not been done in the LVIA's images. The extensive wirescape around the plant on the ground, as illustrated typically in its Viewpoint 6(a), is bound to have harmful effects on landscape and visual receptors.</p> <p>13. The Applicant states in para. 5.4.30 that the design parameters are explained in Application Document EN020026-000230-6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project. The Descriptions in section 4.2 Suffolk begin with descriptions of the infrastructure's components with dimensional and technical information. Saxmundham's converter station is from paras. 4.2.31 to 4.2.35. It shows the indicative view in Plate 4.1 below, which is based on the application plan below that.</p>  <p>EN020026-000230-6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project Plate 4.1 – Indicative view of the proposed Saxmundham Converter Station based on the plan below</p>

ExQ1**Question to:****Question:****1LVIA2
continued**N Bridges response
continued**1LVIA2
continued**N Bridges response
continued**EN020026-000226-2.13 Design and Layout Plans.**

Drawing DCO/S/DE/SS/1205 – Typical Suffolk Converter Station Layout Plan (GIS) Regulation 5(2)(o), used as the basis for the model image above

ExQ1	Question to:	Question:
1LVIA2 continued	N Bridges response continued	<p>14. It is explained in para. 4.2.3 that the architectural design may vary within the physical parameters and Limits of Deviations. Design principles have been developed and submitted in section 3.3 Application Document 7.12.1 Design Principles – Suffolk at Table 3.1. This identifies a series of design issues in column 1 with the Key Design Principles within them in column 2. The issues are standard points that all architects consider when designing new buildings. The Principles are more detailed aspirations and approaches which could be adopted in a design.</p> <p>15. However, 7.11.1 Design Approach Document – Suffolk Version B illustrates studies of most of these topics. The breadth of the options and images is a competent study. With such design development, it is inexplicable why, having received the Design Review Panel's feedback, the Applicant cannot make a decision and commit to a particular design concept. The Rochdale Envelope could still be applied if any minor changes in a variety of topics become necessary. As currently proposed, the use of the Rochdale Envelope to include the submitted design in a DCO would permit an uncontrolled architectural design which would cause unnecessary harm to the landscape and settings of heritage assets.</p> <p>16. It is also inexplicable why some images have modelled the plant and wirescape outside the converter sheds but this has not been done in the LVIA's images. The extensive wirescape around the plant on the ground is bound to have harmful effects on landscape and visual receptors.</p>
1LVIA4.	Applicant	<p>Lighting</p> <p>The ExA notes the rural and unlit context of the substations and converter stations in Suffolk and Kent and that there is very limited detail in relation to operational lighting in the application documents. Provide additional detail in terms of the height and type of any lighting installations and light contour plans. Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity. This should include the cumulative effects with other significant light sources, such as Thanet Earth and Richborough Energy Park in Kent. If the applicant considers that an assessment is not required, provide a detailed explanation of your reasoning.</p> <p>Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not? Local authorities may also like to comment.</p>

1LVIA4.	N Bridges response	<p>1LVIA4 - Lighting</p> <p>17. I support the ExA's request for further design and assessment of the proposed project affecting receptors from operational light pollution at night in the dark countryside. This is a major omission from the LVIA. The impact of the floodlighting at Felixstowe docks is widespread and very noticeable contrast because East Suffolk has such dark skies. This sets a high standard for keeping any light pollution in this application's sites to the absolute minimum, if at all.</p>
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ExQ1	Question to:	Question:
1LVIA7.	Natural England, Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP), Suffolk County Council, East Suffolk District Council	<p>National Landscape (NL) duty</p> <p>Provide your comments on Document 9.47 NL Duty Section 85 Duty Technical Note [REP1-120], including the approach to the s85 duty, the natural beauty indicators in table 3.2 and the special qualities indicators in table 3.3 and the cumulative effects on the NL in section 4 and tables 4.1 and 4.2.</p> <p>In your response include consideration of whether the extent and nature of the preferred area of acid grassland on plate 3.2 of [REP1-120] is sufficient and the appropriateness of the maintenance period of 10 years.</p>
1LVIA7.	N Bridges response	<p>1LVIA7 – See response also in 1LVIA9 which shows the indicators in the Tables not being properly addressed</p>

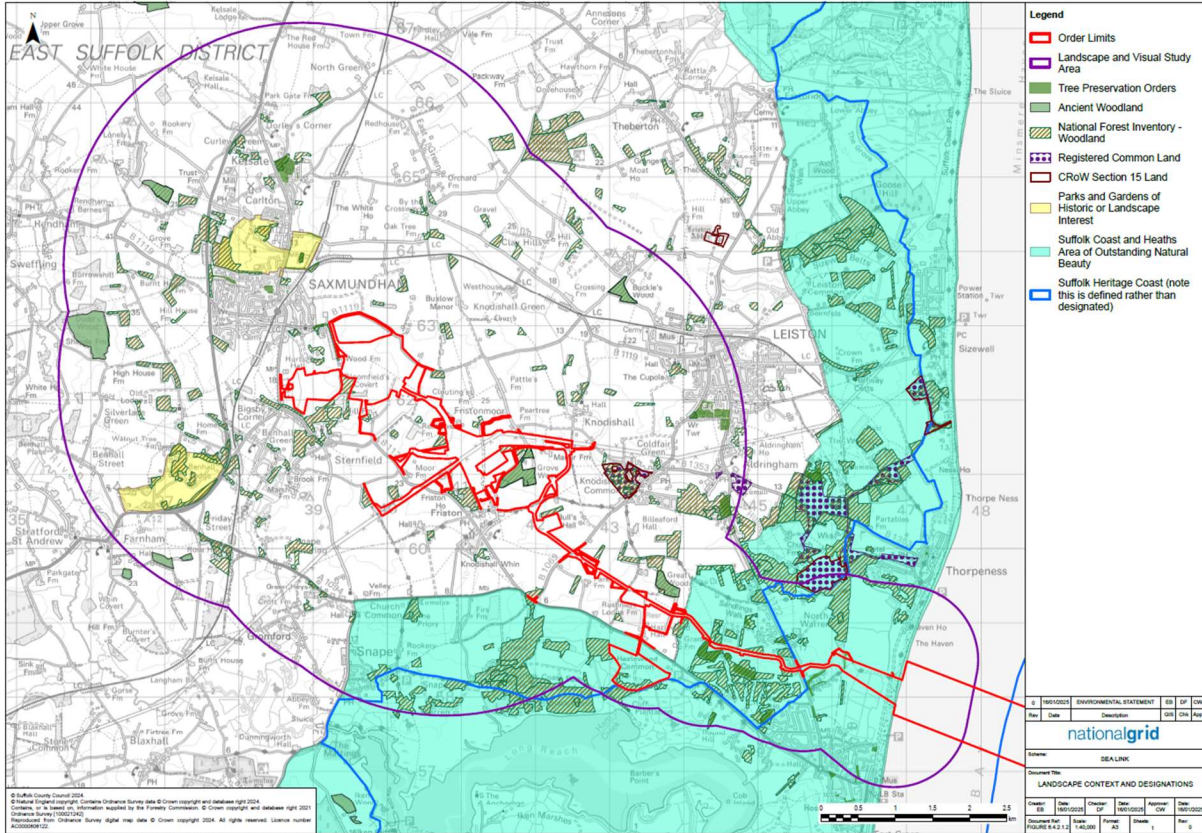
1LVIA9.	Applicant	<p>Effects of construction on defined features of the NL</p> <p>Notwithstanding the information provided in [REP1-120], provide a more detailed and thorough response to the comments from SECHNLP that the landscape and visual assessment does not fully consider the impacts on all defined features, including scenic quality, relative tranquillity and relative wildness, during construction. If it is found that significant effects are likely, what mitigation measures are proposed?</p>
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ExQ1	Question to:	Question:
1LVIA9.	N Bridges response	<p>National Landscape Duty Section 85</p> <p>Natural Beauty Indicators</p> <p>18. The key characteristics of the Landscape and Cultural History ES topics should not be assessed solely on inter-visibility or proximity of the Proposed Project with the cumulative developments. The LDA Design report on the "Natural Beauty and Special Qualities Indicators" of the SC&H AONB (v1.8, 21 November 2016) followed Natural England's guidance for assessing Landscapes for designation. The following are specifically relevant to the two ES topics.</p>
1LVIA9.	N Bridges response continued	<ul style="list-style-type: none"> • Within the factor Cultural Heritage are indicators built assets such as military structures (e.g. Martello Towers...). Their presence make a particular contribution to a distinctive sense of place and other aspects of scenic quality. • Within the factor Historic influence on the landscape, there is the visible presence of specific landscape elements or features that provide evidence of time depth or historic influence on the landscape (e.g. early mediaeval churches, Martello Towers, Snape Maltings...) • Within the factor Association of the landscape with people, places or events is evidence that the landscape has associations with notable people or events, cultural traditions or beliefs (e.g. the arrival of St. Botolph and the founding of his monastery at Iken...) <p>Special Beauty Indicators</p> <p>19. The Special Qualities Indicators include further factors :</p> <ul style="list-style-type: none"> • Within the factor Health and Well being, access along defined routes for walking and cycling are extensive rights of way networks... offering access to key landscape types (such as coast, Sandlings heath, forest, wetlands and estuaries) • Within the factor Opportunities for active and passive recreation are indicators on the coast, offshore and inland including rambling, boating, bird-watching and fishing at sea and in the estuaries and rivers (e.g. the public footpaths that wind around the edges of the Alde estuary). <p>20. The Applicant's consideration of its duty under Section 85(A1) (s85) of the Countryside and Rights of Way Act 2000 (CRoW Act) is in Application Document EN020026-001438-9.47 National Landscape Section 85 Duty Technical Note. It used the LDA Design 2016 report noted above to inform the baseline for the AONB. This was assessed in the 6 documents cited in para. 1.2.4 of the above 9.74. Its section 3 states the Approach to s85 Duty. Natural Beauty and Special Qualities Indicators are in section 3.4. Information has been gathered from documents APP-096, APP-097 and APP-057 into Tables 3.2 and 3.4.</p> <p>21. Table 3.2 covers Natural Beauty Indicators but mislabels the Factors as Indicators. Extracts of the Indicators for each of the 6 Factors are in the second column with the Effects arising from the Proposed Project in the third column. Any relevance to acid grassland enhancement is in the last (fourth) column. Table 3.3 covers the Special Qualities Indicators in the same format.</p>

ExQ1	Question to:	Question:
		<p>22. There are no assessments nor sources given as the basis for the effects arising and the levels of significance during construction, operation and maintenance. I have checked the Landscape Baseline which consistently notes the outstanding nature conservation value and layers of historical activity across the Alde estuary. Nevertheless para 2.1.11 states:</p> <ul style="list-style-type: none"> SCLCA LCAs B5 and J4 and SCASNE SCT 01 are scoped out for construction, operation, maintenance and decommissioning due to a lack of inter-visibility with the Suffolk Onshore Scheme such that effects on the setting or perceptual qualities of these LCAs and SCT would be limited with no significant residual effect.
1LVIA9	N Bridges response continued	<p>23. No evidence was cited for how there would be a lack of inter-visibility. Either the ZTV study did extend to the whole of the south side of the Alde estuary and it has been hidden, or the assessor was not aware of it and used a summary judgement with no evidential basis. (EN020026-000343-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 7 of 7 includes 5 ZTV plans illustrating the visibility of individual Project and in combination.) Para. 2.1.9 of 9.47 states that the Proposed Project was not assessed against District Seascape Character designations of the Suffolk Coastal LCA and the Coastal Character Areas. The exclusion of the Alde estuary did not consider the effects on it from floodlights glowing in the night sky even if partly or completely obscured by intervening vegetation nor visibility in the winter without foliage.</p> <p>24. There is no mention anywhere in this document of the setting of the AONB and any affects from the Proposed Project and the three Cumulative projects assessed. As the most extensive and highest above ground development will be outside the AONB but visible from inside it, this is a very serious omission in the EIA process.</p> <p>25. The character and appearance of the landscape overall and the collective character from the age and architecture of historic buildings within settlements and landscapes are critical.</p> <p>26. The value of the S&SC&H National Landscape lies in its rurality, sandlings vegetation interspersed with tidal rivers and the seashore. This part of Suffolk is fundamentally rural with market towns, villages, churches and patterns of fields and woodland bearing witness to centuries of inhabitation and working of the land. The only large scale industrial character is found at Sizewell Power Station and the major towns like Ipswich, Lowestoft and Felixstowe. The cumulative effect of the consented substation at Friston, this Proposed Project with clear plans for two more converter stations, the Helios solar farm and other schemes identified in the above document will combine to change the character of the countryside for ever over an area far wider than the intense industrialisation of this application site.</p> <p>27. The third converter station site at Saxmundham (for LionLink) is not assessed for cumulative Impacts and its site has been cut out of the red line site boundary. The xx illustrates a replica of the two Sea Link converter</p>

ExQ1	Question to:	Question:
		<p>stations designs. With so much detail already in the hands of NGET and its design team, there is nothing preventing the third station being assessed in detail.</p> <p>28. If the third CS is not assessed in this DCO, then its effects should not be assessed in isolation, but rather together with Sea Link in combination with it. The harm to the landscape and cultural heritage acknowledged by this applicant should be included within the proposed project as it would be invidious for the environment created by Sea Link to be a very low quality baseline for Lion Link and a travesty of the the whole purposes of Environmental Assessment.</p>

ExQ1	Question to:	Question:
1LVIA11.	Applicant	<p>Heritage Coast</p> <p>The ES Part 2, Chapter 1 Suffolk Landscape and Visual [APP-048] makes numerous references to the impacts on the Heritage Coast being assessed in appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]. There is very limited assessment of the effects on the Heritage Coast in that document, although the designation is included in tables 1.11 and 1.12 of [APP-048]. Provide an explanation of how the effects on the Heritage Coast have been assessed, including evidence base and methodology, as it is not clear how the summary has been arrived at.</p>
1LVA11.	N Bridges response	<p>Heritage Coast (See also response to 1CH3 – Settings’ Intervisibility)</p> <p>29. The very limited assessment of effects on the Heritage Coast and an explanation on how the summary has been arrived at is also relevant to the historic interest of St. Botolph’s church at Iken and its setting in the Alde estuary. The Martello Tower is the culmination of the Board of Ordnance’s defensive line up the East Coast built during the Napoleonic Wars.</p> <p>30. Note policy EN-1, Para 5.10.10 : Heritage Coasts are defined areas of undeveloped coastline which are managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors.</p> <p>Note that the policy covers not just the shoreline but also the area inland from it.</p> <p>Para 5.10.11: Development within a Heritage Coast (that is not also a National Park, The Broads or an AONB) is unlikely to be appropriate, unless it is compatible with the natural beauty and special character of the area.</p>

ExQ1	Question to:	Question:
		31. The plan extracted below shows that the area of the Heritage Coast extends over the whole of the Alde Estuary. This is another policy reason for assessing visibility and setting of St Botolph's church, the public footpaths around the southern edge of the estuary, and Martello Tower CC at Slaughden.
1LVA11.	N Bridges response continued	 <p>Legend</p> <ul style="list-style-type: none"> Order Limits Landscape and Visual Study Area Tree Preservation Orders Ancient Woodland National Forest Inventory - Woodland Registered Common Land CRoW Section 15 Land Parks and Gardens of Historic or Landscape Interest Suffolk Coast and Heaths Area of Outstanding Natural Beauty Suffolk Heritage Coast (note this is defined rather than designated) <p>EN020026-000339-6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7, page 4</p>
1LVA11.	N Bridges response continued	<p>The weight given when heritage is harmed</p> <p>32. Identifying heritage harm and what regard and weight it should be given in assessment and the planning balance was Ground 2 for SASEAS Judicial Review of the SoS's approval of the DCOs for EA1N and EA2. Lang J reviewed in her judgment [2022] EWHC 3177 (Admin), issued 13 December 2022, where the two different</p>

ExQ1	Question to:	Question:
		degrees of policy constraint – " great weight " or " must have regard to " – are applied to determining the severity of heritage harm. The various duties are found in Regulation 3 of the Decisions Regulations 2010 and the statutory regimes under the PLB&CA 1990 and the TCPA 1990, NPS EN-1 and EN-3 (both July 2011). She also drew upon case law [108 – 112].
1LVA11.	N Bridges response continued	<p>33. Lang J determined that the less onerous July 2011 EN-1 policy wording in force at the time should be applied. Its para 5.8.18 Stated that</p> <p><i>"... the IPC should weigh any negative impact against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits will be needed to justify approval."</i></p> <p>34. 9.34.1 B – Section 6: why do the Year 15 images use a summer baseline? A winter baseline would potentially reveal more of the proposed project and would be a more comprehensive assessment of effects.</p> <p>35. The November 2023 version of EN-1 stated the equivalent at para. 5.36 with additional text at its para. 5.9.28:</p> <p><i>"...the Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification."</i></p> <p>Para. 5.9.36:</p> <p><i>"...the Secretary of State should give great weight to any negative effects, when weighing them against the wider benefits of the application. The greater the negative impact on the significance of the designated heritage asset, the greater the benefits that will be needed to justify approval."</i></p> <p>36. The December 2025 version of EN-1 states in its paras. 5.9.29 and 5.9.37 the same as in the 2023 version just superseded. Application of the 2023 wording would have been a more onerous test within the planning balance of EA1N and EA2.</p> <p>37. As this Proposed Project includes the consented development at Friston, approved under the less stringent July 2011 policy EN-1, it will have to be reassessed this time against the different latest policy. From the ExA's conclusions on EN010077, it is clear that the assessment in the Sea Link DCO will be different. There is now the addition of Sea Link to the Friston project, and the cumulative schemes of LionLink, and others. It is important that the partial rather than complete assessment of all cumulative projects is not repeated. The ExA and SoS must be provided with a thorough ES to allow proper conclusions balancing heritage harm and benefit.</p>

ExQ1	Question to:	Question:
1LVIA12	Applicant	<p>Visualisations</p> <p>The ExA notes that type 1 and type 3 visualisations have been provided in the application documents. In view of the nature and scale of the proposed development, the sensitivity of the context and the magnitude of the effects that have been identified, provide an explanation as to why type 4 visualisations have not been provided, with reference to the guidance in the Landscape Institute Technical Guidance Note 06/19.</p> <p>Provide an explanation of how type 4 visualisations would differ from the type 3 visualisations that have been provided, in terms of the photographic equipment, presentation of the information, locational accuracy and whether the data used is verifiable.</p> <p>Summarise the purpose and use of the type 3 visualisations and the extent to which they have been supplemented by other evidence such as site visits, professional judgement in undertaking the overall assessment?</p> <p>Furthermore, the ExA notes that the winter year 15 visualisations at the following viewpoints do not allow a proper assessment as there are significant obstructions in the foreground due to crops. Therefore, for Suffolk viewpoint 8a provide a year 15 winter visualisation.</p>
1LVIA12	N Bridges response	<p>Visualisations</p> <p>38. My RR commented that the quality of visualisations in the LVIA are inadequate for the magnitude of effects and given the extensive detailed studies in the EN020026-001621 7.12.1 Design Principles Document- Suffolk Version B. The Applicant has submitted many supplementary images which still inexplicably do not commit to a design which can be imaged properly – see also my response to 1LVIA2 above.</p> <ul style="list-style-type: none"> • DCO Document 9.6.1 Appendix A : Indicative cumulative visualisations of the NG and SPR substations near Friston. NGET's identification of the substations of EA1N and EA2 as cumulative development requires the baseline of all ES topics to exclude the Friston DCOs. The images were only AVR2 quality with no materiality and showed no mitigation. • The submitted document of verified views of LionLink in DCO Document 9.6.3 Appendix C : Visualisations showing the indicative location of the LionLink converter station alongside the Sea Link converter station show none of its massing from the closest viewpoints but do in the most distant (VP 15). LionLink's position is known and its use, layout and buildings will be very similar to Sea Link's enabling it to be modelled in all cumulative images. • The ExA requested [PD-005] an additional verified view within or very close to the northern boundary of the NL AONB. DCO Document 9.11.1 was submitted in September 2025. It only examined the NG and the eastern substations at Friston and one converter station at Saxmundham. An updated ZTV

ExQ1	Question to:	Question:
		<p>plan showed the visibility of the two substations separately and also combined. The image did not model the invisible massing in wireline which is standard practice.</p> <ul style="list-style-type: none"> • DCO Documents 9.48 River Fromus Visualisations Parts 1, 2, 3 [REP 1-298, 299, 300] were submitted to inform ongoing discussions with ESC and SCC. Three heights were modelled from 2 original and 3 additional Viewpoints. The Saxmundham converter station was only modelled as an AVR0 block without Lionlink at the same height, whether obscured or not.

ExQ1	Question to:	Question:
4. Cultural heritage		
1CH3.	Historic England Kent County Council Suffolk County Council	<p>Inclusion of heritage assets in the ES assessment</p> <p>Are there any designated or non-designated heritage assets within either county that were not considered within the ES, or that were scoped out for further assessment within the ES, which should have been assessed? Furthermore, were the study areas used sufficient to include all heritage assets which could be impacted by the proposed development?</p>
1CH3.	N Bridges response	<p>Inclusion of heritage assets in the ES assessment</p> <p><i>Recent relevant planning appeal decision November 2025:</i> Appeal ref: APP/Z2260/W/25/3368475 PINS ref: 3368475</p> <p>39. I would like to draw the attention of the ExA to a planning appeal decision issued on 12th December 2025. The subject of this planning appeal and its determination are highly relevant with close parallels with the Cultural Heritage and Landscape & Visual ES topics of this DCO. A large housing development at Cottington Road, Cliffsend, Kent, CT12 5LJ (coincidentally on the fringes of the Sea Link Kent DCO site), was proposed in the setting of a Victorian Grade II listed monument. It commemorated the landing of St Augustine at Richborough in 697AD and the place inland on or near the planning application site of his subsequent meeting with and conversion of King Aethelbeht of Kent and thousands of his subjects.</p> <p>40. The meeting, recorded in the C8th by the Venerable Bede, was a seminal event in the religious history of what was later to become England. The application was refused planning permission because of the harm which would be caused to its setting, especially the historic significance of the place and event, and the commemorative purpose of the memorial.</p>

ExQ1	Question to:	Question:
		<p>41. I was the heritage witness at the subsequent planing inquiry in November 2025, acting for Thanet District Council which had refused planning permission primarily on heritage grounds. The key reason for refusal was the effect on the setting of the listed building – no development was proposed to the listed fabric or on its small site. The historic geography of the landscape retains enough physical clues for the time depth to be perceived within the current landscape [IR 45]. This contributes to an understanding of historic context and sense of place.</p>
1CH3	N Bridges response continued	<p>42. After the historic meeting, St. Augustine was permitted by the King to proceed to Canterbury where he founded a church. Canterbury Cathedral on its site is dedicated to St. Augustine and has been the centre of the Anglican Church for centuries. The Inspector's key heritage reason for refusing the proposed development was the likelihood of highly adverse effects on both the significance of the cross and the ability to appreciate its significance. The effects fall within the 'upper range' of less than substantial harm [34].</p> <p>43. St. Botulph's church, Iken, has very similar historical parallels with St. Augustine's Cross. St. Botulph chose Iken's prominent site as his base in 647AD for converting East Anglia to Christianity. According to the Anglo-Saxon Chronicle he founded a monastery there in 654AD. The Life of Ceolfrith mentions an abbot named Botolph in East Anglia whom Ceolfrith visited about the year 670. It is believed he died in 680 and was buried on the site. The Vikings later destroyed his buildings and his remains were disinterred by the Christian faithful and removed to Bury St. Edmunds as priceless relics. See Appendix A to my RR for more details, in particular the research by the Suffolk Archaeological unit of the church with its original cross.</p> <p>44. The current mediaeval church on the site of his monastery is a building listed for its own architectural significance. But the building also commemorates the site of the important historical events of St. Botulph's commission by King Anna and the success of his mission with ultimately of over 50 Benedictine churches being built in East Anglia dedicated to St. Botulph. The parallel lives and historic achievements of Saints Botulph and Augustine 50 years later have their own unique significance in different parts of the country, sharing their uncertain beginnings arriving by boat into a hostile land.</p> <p>45. The siting of St. Botulph's within the Alde Estuary and the S&EC&H National Landscape AONB and the Heritage Coast is a major historical and aesthetic contribution to the character of the area. The setting of the church on a very unusual corraline crag promontory on the Alde estuary physically expresses the outreach of his mission from a place of safety (see my connected responses in 1LVIA9, 1LVIA11 and 1LVIA 12).</p> <p>46. As described in my RR, the Applicant and its landscape and visual consultants knew from their ZTV plans at PEIR stage, and the Friston DCO, that the Saxmundham converter stations and Friston substation would theoretically be visible within the settings of St. Botulph's church and the Grade II* Martello Tower CC around the Alde estuary. They could also be seen from within a wide swathe of the Alde estuary. Yet the</p>

ExQ1	Question to:	Question:
		<p>Applicant has drawn the Area of Search so narrowly these key heritage assets were not assessed in the Environmental Statement.</p> <p>47. This technicality has excluded important and sensitive receptors from any Environmental Assessment. NGET makes no analysis of the historic context of the Alde estuary nor of its sense of place in any documents submitted to this DCO Hearing. The Landscape baseline Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP096] scoped out the Alde estuary (J4) in Table 2.8. This decision is explored in my response to ExQ1's 1LVIA9. A candidate views study should be carried out as soon as possible to document what will be seen and understand the effects of the Proposed Project.</p>
1CH3.	N Bridges response continued	<p>Settings – Intervisibility (See also my response to 1LVIA11 – Heritage Coast)</p> <p>48. Lang J's High Court judgment [2017] EWHC 1456 (Admin) quashed development within the settings of the designated buildings of the Grade I listed Kedleston Hall, its landscape and adjacent CAs where there was no intervisibility, a key point in her judgment, and an error by the Inspector who approved it. There are parallels with Hurts Hall, St. John's church, and Saxmundham CA. all of whose settings would be affected permanently by the bridge over the River Fromus, its embankments and planting, traffic movements and of course the converter station(s).</p> <p>49. Although the Kedleston case involved a Grade I listed Adam-designed Hall and parkland, the judge considered that even less than substantial harm was sufficient to prevent the proposed housing development. S66 of the PLB&CA Act 1990 and EN-1 do apply to settings not intervisible with their heritage assets.</p> <p>50. I support whole-heartedly the ExA's request in 1CH3 – "<i>Inclusion of Heritage Assets in the ES assessment</i>" – and for St. Botolph's Church and Martello Tower CC to be brought into the Cultural Heritage and Landscape and Visual Chapters of the ES for proper assessment as justified by the ZTV plans. The multiple designations covering the Alde estuary, as well as the Heritage Coast and National Landscape, should also be included in the assessment.</p> <p>Settings – The Policy</p> <p>51. Planning policy on the settings of heritage assets are consistent across all laws and policies. Acts of Parliament (PLB&CA 1990 s66), national policy (NPPF 2024, paras. 207, 213), PPG online, local policy (ESC SCLP11.3, SCLP11.4, SCLP11.5, SCLP11.6) and NPS policy December 2025 (EN-1 5.9.3) all state that these settings are just as important as the fabric of the assets when assessing significance. This has been reinforced by the St. Augustine's Cross appeal decision. This includes conservation areas. Given the gaps in the assessment of heritage assets and their settings in this DCO's Cultural Heritage and LVIA ES Chapters, it is worth recapping</p>

ExQ1	Question to:	Question:
		<p>exactly what settings are and how they should be appraised and assessed due to their joint contribution to the character and appearance of the whole area.</p> <p>52. The NPPF Glossary defines the setting of a heritage asset as: <i>The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.</i></p>
1CH3	N Bridges response continued	<p>53. Historic England's <i>Good Planning Advice Note 3</i> (March 2017) has the most detailed guidance. I have picked out some key points which are germane not just to the assessment of St. Botolph's and Martello Tower CC, but also all the heritage assets in the Cultural Heritage assessment with some relevant to the LVIA.</p> <p>54. ¶6 Views can be related to the wider landscape <i>Part 1: The way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.</i></p> <p><i>The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.</i></p> <p><i>Planning authorities may need to consider the implications of cumulative change.</i></p> <p><i>Developments which materially detract from an asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.</i></p> <p>¶7 Setting is separate from the concepts of curtilage, character and context.</p> <p><i>Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings contribute.</i></p> <p><i>Context of a heritage asset is a non-statutory term used to describe any relationship between it and other heritage assets, which is relevant to its significance, including cultural, intellectual, spatial or functional. Contextual relationships apply irrespective of distance, sometimes extending well beyond what might be considered an asset's setting, and can include the relationship of one heritage asset to another of the same period or function.</i></p>

ExQ1	Question to:	Question:
		<i>A landscape is 'an area, as perceived by people, the character of which is the result of the action and interaction of natural and/or human factors' (Glossary, GLVIA, 3rd edition, p157).</i>
1CH3.	N Bridges response continued	<p>¶18 The extent of setting: <i>It cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset.</i></p> <p><i>Extensive heritage assets ... can include many heritage assets, historic associations between them and their nested and overlapping settings. A conservation area is likely to include the settings of listed buildings and have its own setting, as will the hamlet, village or urban area in which it is situated.</i></p> <p>¶19 <i>Setting is not itself a heritage asset, nor a heritage designation... Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.</i></p> <p>¶10, ¶11 Views and setting</p> <p>¶14 Landscape Assessment and Amenity <i>Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it ... is a major component of the setting, rather than an incidental element within the wider landscape.</i></p>

ExQ1	Question to:	Question:
14. Cumulative effects (inter-project)		
1CEInter1.	Applicant	<p>Coordinated consideration of network projects</p> <p>Having regard to NPS EN1, paragraph 3.3.79 and 3.3.80, can the applicant explain how all avoidable disruption, inefficiency, and visual impacts etc have been taken account in the strategic and detailed stages of the proposed development having regard to other planned and new energy projects in Suffolk? Include both spatial and temporal considerations in your answer. In answering, ensure that the response has regard to the relevant submissions from Suffolk and Essex Coast & Heaths National Landscape Partnership [REP1-270].</p>
1CEInter1.	N Bridges response	<p>Coordinated consideration of network projects Cumulative effects (Inter-project) <i>Friston Substation:</i> <i>East Anglia One North (EA1N)- EN010077</i> <i>East Anglia Two – E010078</i> <i>Lion Link</i></p> <p>55. Large unsubmitted cumulative schemes were known about at the time of the Friston DCO Inquiry into the two projects but were not included in their principal Cumulative Assessment. The arguments for and against the need for this were assessed in a Judicial Review by Lang J in her judgment on 13th December 2022 [EWHC 3177 (Admin)] in the case of SASES v. SoS, EA1N and EA2.</p> <p>56. The ExA had requested an “Extension of National Grid Substation Appraisal” from the Applicants EA1N and EA2. This gave information about the likely environmental effects of extending the Proposed National Grid substation at Friston to accommodate the Nautilus and Eurolink projects. SASES claimed that neither the ExA nor the Applicants considered the Extension Appraisal in reaching their conclusions.</p> <p>57. The ExA’s reasoning for not considering the information was that the “environmental information” did not have the status of “further information” which was “directly relevant to reaching a conclusion on the significant effects on the environment” and for that reason did not need to be taken into account. However, environmental information is at the core of an ES and if not taken into account in assessing impacts, then the decision whether to grant development consent will not be based on accurate assessment.</p> <p>58. The Applicants found that there was a lack of information about the Nautilus and Eurolink projects which justified failing to assess them. They claimed there was no breach of its obligations under the EIA Regulations 2017 as there was insufficient reliable information on the projects to carry out a cumulative impact assessment. The information specified in Advice Note 17 was not available. The projects were a</p>

ExQ1	Question to:	Question:
		<p>considerable way from being "existing or approved projects" for which cumulative assessment would be required by reference to paragraph 5 of Schedule 4 to the EIA Regulations 2017. This lack of initiative is remarkable when NGV is a subsidiary company of NGET.</p> <p>59. The ExA's Conclusions to the SoS had drawn attention to the "marginal compliance" of ES topics flood risk, historic environment and landscape and visual onshore. Also, there were instances in which the "siting, design and effects of the proposed development approach the margin of what can be accepted in policy terms..." [EN010077-009800 Volume 2, 31.2.1].</p> <p>60. The ExA's Conclusions on the Case for development Consent were more forthright. They are quoted below because the conclusions were based on the incomplete assessment of cumulative schemes and the weaker EN-1 policy on heritage harm than existed shortly after.</p>
1CEInter1.	N Bridges response continued	<p>[28.4.4] <i>The local harm that the ExA has identified is substantial and should not be under-estimated in effect. Its mitigation has in certain key respects been found to be only just sufficient on balance.</i></p> <p>61. [28.4.45] <i>In that regard, the ExA observes that effects of the cumulative delivery of the Proposed Development with the other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the Proposed Development in this location. This ExA does not seek to fetter the discretion of future decision-makers about additional development proposals at this location. However, it can and does set out a strong view that the most substantial and innovative attention to siting, scale, appearance and the mitigation of adverse effects within design processes would be required if anything but immaterial additional development were to be proposed in this location.</i></p> <p>62. [28.4.6] <i>In relation to this conclusion, the ExA observes that particular regard needs to be had at this location to flood and drainage effects (where additional impermeable surfaces within the existing development site have the potential to affect the proposed flood management solution), to landscape and visual impacts and to impacts on the historic built environment, should these arise from additional development proposals in the future.</i></p> <p>63. The ExA had added a "significant caveat" to the rDCO. Its recommendation was based on the legal and policy framework extant on the day the Examination closed, 6 July 2021. The ExA was aware of the proposed updates to the Energy Suite NPSs against which the proposed project had not been examined (nor drawn to the attention of the IPs). The SoS was advised that if the situation changed, the ExA's recommendations may change. The SoS had to assess "on what terms any further consideration of the rDCO or consultation with the IPs might be necessary." [EN010077-009800 Volume 2, 30.7].</p>

ExQ1	Question to:	Question:
		<p>64. Lang J concluded in favour of EA1N and EA2 as “the developments in question were not “existing and/or approved projects” in respect of which a cumulative assessment would be required by reference to paragraph 5 of Schedule 4 of the EIA Regulations 2017” [197]. “The Extension Appraisal did not constitute a cumulative impact assessment. The two projects were at such an early stage that there was not sufficient reliable information to undertake a satisfactory cumulative assessment” [198].</p> <p>65. This is particularly relevant when the sheer scale of development proposed for Friston, Saxmundham and the surroundings in East Suffolk is of an industrial character so antithetical to the character of the countryside inside and outside the National Landscape. There has never been a strategic plan proposed or adopted for this intensive and permanently harmful infrastructure and its parasitic uses, let alone submitted for public consultation.</p>
1CEInter1.	N Bridges response continued	<p>66. If this scenario of successive incomplete environmental assessments is allowed to stand and be repeated, there will be a temptation for future applicants to keep project details so vague that technically they do not qualify for cumulative assessment, when cumulative impacts are highly likely given the scale and nature of the projects in combination. This incremental submission and assessment of applications undermines the statutory purposes of the EIA process.</p> <p>67. This conundrum is present in the Sea Link DCO process. NGET has submitted numerous plans illustrating several options for schemes on-shoring between Southwold and Aldeburgh and connecting to Saxmundham’s converter stations with the additional possibility of connecting through the NG MITS substation to the pylons at Friston. LionLink is expected to submit its DCO application in early 2026 when the Sealink DCO will be concluding.</p> <p>68. If a relevant future scheme has been identified as potentially having a cumulative effect but has not been assessed cumulatively in an ES due to limited details, how should its cumulative effects be assessed when the project is ready to be submitted for a DCO? Should it be assessed retrospectively with the earlier and now determined Friston projects as cumulative schemes? This would arrive at the most accurate assessment of cumulative environmental effects. If not, successive assessments will be adopting the increasingly harmed environmental baselines which have weaker values and thus allegedly less harmful effects. Without a finite scope and a cumulative assessment of all proposed projects on the unspoilt designations, this part of Suffolk will be harmed for ever. The overall assessment of environmental effects would be wholly inaccurate and negate the statutory process and its purposes. Precedents for harm will be set for all the other National Landscapes.</p> <p>Sea Link’s Cumulative Schemes Application documents: EN020026-000245 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects – Figures</p>

ExQ1	Question to:	Question:
		<p>EN020026-000466-6.4.2.13.A ES Figures Suffolk Descriptions of Other Developments</p> <p>EN020026-000245-6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects</p> <p>69. NGET assessed the total cumulative effects for relevant other developments for Landscape and Visual in the grouping of Sizewell C, EA1 and EA2, and LionLink in Table 13.35. The summary assessment identified significant cumulative effects from EA1N, EA2 and LionLink on the S&EC&H NL AONB and the Suffolk Heritage Coast during construction. At operation, it was concluded that <i>"The potential for for significant cumulative effects is unlikely due to sufficient geographic separation, intervening vegetation , reinstatement of cable corridors and distance between the onshore permanent elements of the developments."</i></p> <p>70. The overall assessment of cumulative effects with all projects concluded: <i>"No significant cumulative effects anticipated for operatinand maintenance."</i></p>
1CEInter1.	N Bridges response continued	<p>71. The assessments for total cumulative effects for Cultural Heritage are in Table 13.38. The impacts on the settings of designated assets for EA1N and EA2 identified "potential impacts" without a description. LionLink's effects are assessed limited to the agricultural component of the fire-damaged Wood Farm's setting. The overall assessment of cumulative effects for all projects have been assessed as <i>"Not significant."</i></p> <p>72. Table 13.1 describes the Study Areas for each topic. The geographical limitations for those for Landscape and Visual and Cultural Heritage have been identified in 1LVIA2 and 1CH3. The earlier Stage 1 and 2 assessments of the long-list of all individual projects further reveal that the omission of key assets, the misunderstanding of the widespread character and sense of place of the countryside, let alone the context of the NL AONB, have all underestimated the level of the cumulative effects. The misapplication of policy and law on settings demonstrates the Applicant's conclusions <i>"Not significant"</i> are seriously flawed.</p>

Conclusions

73. The Applicant claims that it has addressed all the points from RRs either in themed topics or specifically to major stakeholders and objectors. None of the points in my RR have yet been addressed by the Applicant. It has taken the ExA to address the Applicant's avoidance of valid issues by raising them in ExQ1. The observations in this report add specific and relevant items to be included in the Applicant's response to the ExA.

APPENDIX

Cottington Road, Cliffsend, Kent, CT12 5LJ

Recent relevant planning appeal decision, November 2025:

Appeal ref: **APP/Z2260/W/25/3368475**

PINS ref: **3368475**

Thanet District Council planning application ref: **OL/TH/24/1473**



Appeal Decision

Inquiry held on 5-6, 11-13, 24 November 2025

Site visit made on 13 November 2025

by Benjamin Webb BA(Hons) MA MA MSc PGDip(UD) MRTPI IHBC

an Inspector appointed by the Secretary of State

Decision date: 12th December 2025

Appeal Ref: APP/Z2260/W/25/3368475

Land adjacent to St Augustine's Cross and north and south of Cottington Road, Cliffsend, Kent CT12 5LJ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant outline planning permission.
 - The appeal is made by Richborough against the decision of Thanet District Council.
 - The application reference is OL/TH/24/1473.
 - The development proposed is erection of up to 200 dwellings (Class C3) with car parking and all ancillary enabling works including associated highway, drainage and landscape works.
-

Decision

1. The appeal is dismissed.

Preliminary Matters

2. With the parties' agreement, I have edited the description of development in the banner heading above to remove superfluous text.
3. The application was submitted in outline with all matters except access reserved for future consideration. Whilst the 2 main accesses into the development have been presented in detail, the locations of other accesses are shown on a separate layout and access parameter plan (the parameter plan). I have therefore treated the parameter plan as showing a mixture of details both for approval and intended to guide future discharge of the reserved matters.
4. The parameter plan was directly modelled on a detailed indicative framework plan, which at the time of its production had failed to take account of known archaeological constraints on site. Whilst a plan showing a revised indicative layout was presented during the Inquiry to show how an archaeological exclusion zone could be fitted into the northern part of the site, the parameter plan itself remains unmodified and thus out of date. This is a matter that would therefore require careful clarification by condition.
5. The indicative layout otherwise provides a reasonable guide to the scheme likely to be presented in clearance of the reserved matters. Indeed, given the quantum and density of the proposed development, as too agreed height restrictions, there appears limited scope for significant variation within the proposed parameters.
6. Insofar as indicative landscaping plans have also been provided, both at application stage and within proofs, none are up to date or wholly consistent with the other plans provided. This is a matter whose implications I shall consider further below.

7. The application was partly refused on the basis that no surveys for bats and breeding birds, and no archaeological assessment/field evaluation had been undertaken; that no mitigation of the scheme's likely significant effects on habitats sites had been secured; and that a legal agreement securing affordable housing and contributions towards infrastructure had not been provided. Following the provision of bat and bird surveys with the appeal; archaeological excavations undertaken during the course of the inquiry; related agreements reached on exclusion zones and drainage; and the provision of a Section 106 agreement (the S106), the Council has withdrawn its objections. I shall therefore return these matters below only to the extent that they may remain relevant.

Main Issue

8. The main issue is effect of the development on the character and appearance of the area including its effects on the significance of a designated heritage asset and the landscape.

Reasons

Background

9. Policy SP01 of the Thanet Local Plan 2020 (the Local Plan) sets out the district's spatial strategy, which establishes a broadly permissive approach to development within the 'village confines' of Cliffsend. This is reiterated within Policy H01 of the Local Plan which sets out housing allocations. Neither policy explicitly restricts development outside the village confines, but the intention to primarily direct development to within urban areas and defined settlements is nonetheless clearly indicated.
10. The site occupies a location outside the confines of Cliffsend. Within this context Policy SP24 of the Local Plan seeks to restrict development within the countryside subject to a number of exceptions. As the development would not meet any of these exceptions it both would conflict with Policy SP24, and be contrary to the strategy set out within Policies SP01 and H01 of the Local Plan.
11. The village confines identified by Policies SP01 and H01 act to constrain development at a time when the district's supply of deliverable housing sites (5YHLS) is acknowledged by the Council to be no more than 3.7 years, and claimed by the appellant to be as low as 2.77 years. Wherever the supply falls within this range a shortfall exists, and this has been a persistent feature since the Local Plan was adopted. It is furthermore of note that the Council has never passed the Housing Delivery Test, and has been slow to initiate a required review of the Local Plan. These considerations combine to limit the weight that can be attached to the policy conflicts identified above. It appears that for this reason they were not referenced within the decision notice, albeit both parties acknowledge that a conflict with the development plan would exist on the above basis.
12. Managing patterns of growth to achieve a sustainable distribution of development otherwise remains an objective consistent with the National Planning Policy Framework (the Framework). However, whilst the Council has voiced some concerns over the quality, range and accessibility of local services and facilities, it has not sought to object to the scheme on this basis. Nor does it consider that the function and role of Cliffsend relative to other centres would change as a result of the development. No harm would therefore arise in these regards. The only

remaining areas of dispute centre on matters of character and appearance which, whilst partly grounded in the attributes of the countryside location, are the subject of other policies.

Character and appearance

13. The appeal site is made up of 2 irregularly shaped fields in active agricultural use. These are located just beyond the western edge of Cliffsend, generally falling to the north and south of Cottington Road. The northern field partly wraps around existing development accessed from Cottington Road, as does the far eastern portion of the southern field. Both fields otherwise have open boundaries along the road. Whilst much of the site can therefore be clearly viewed from the road, those parts of the northern field which cannot, are visible from the public footpath which runs through it. A similarly open boundary exists between the west end of the southern field and the plot of land on which St Augustine's Cross stands. Viewed within the context of adjacent space, this plot is more less perceived as a component of the site.
14. The outer perimeters of the site, as too those of the plot on which the cross stands, are generally enclosed. On the south side of the site this is principally by an overgrown hedge which separates the site from a golf course, and on the north side of the site by property boundaries and a substantial railway embankment. Development similarly abuts the eastern end of the southern part of the site. The site is therefore generally well contained. Both the irregular developed edge of Cliffsend and railway have a physical and visual presence whose prominence varies across the site. The site nonetheless retains the character of a vestigial piece of open countryside. This impression is not significantly diminished by the need to pass beneath both the railway line and the A256 when travelling further west along Cottington Road.

(a) St Augustine's Cross

(i) Significance

15. St Augustine's Cross is a Grade II listed building. At its most elementary, the cross is a piece of C19th sculptural masonry modelled on surviving Anglo-Saxon crosses. The quality of its composition, execution and religious iconography, which are intended to be appreciated in the round, impart strong artistic interest. The finer details can only be viewed close up. But though modest in scale and lacking a commanding presence, the overall form of the cross is appreciable in views across and from within the site. More so given that it is a signposted attraction and a subject of pilgrimage that visitors thus look for and expect to see. The cross otherwise plays an important role in informing local identity and distinctiveness as a local landmark, and as a marker of a key historic event.
16. The cross was erected both to commemorate the meeting of St Augustine with King Aethelberht of Kent in 597 AD, and to mark the place where it was believed to have occurred. This was previously marked by a tree recorded as 'St Augustine's Oak' on early editions of the Ordnance Survey, which grew nearby within the southern part of the site. The meeting, recorded in the C8th by the Venerable Bede, was a seminal event in the religious history of what was later to become England. Having been sent by the Pope to convert the Anglo-Saxon population to Christianity, the meeting, at which St Augustine preached to King Aethelberht, marked a return of Christianity, and the beginnings of its foundation as the accepted faith of the Anglo-Saxon population. This is presently recognised in the incorporation of the cross

within the Augustine Camino and the Way of St Augustine, which draw both domestic and international pilgrims. It is presumably also the reason why the cross was considered important enough to have been taken into the custody of the state as part of the national heritage collection. Within this context it is currently managed by English Heritage, and freely accessible to members of the public.

17. The significance of the cross is not therefore solely expressed in its fabric and the C19th act of Victorian commemoration that it represents, even if this does form the focus of the brief 1990s list description. Though it clearly embodies late C19th cultural and religious values, the cross draws a far more critically important part of its significance from the place and the event which historically occurred within it. Indeed, it was ultimately erected, and is viewed, understood and venerated with reference to each.
18. Insofar as *place* can be equated with *setting* in this case, this can be understood as being the general locale within which the meeting occurred. This lacks any current physical definition aside from later boundaries. The site of St Augustine's Oak is itself located within open space undifferentiated from that of the wider landscape of the site. As established above, the cross is viewed within the same context.
19. The relationship between the cross and its immediate surroundings appears much the same as in the 1880s. That said, it was not provided with a specifically designed setting. The surrounding landscape has also undergone broader change since the both the 6th and 19th centuries.
20. Archaeological investigations nonetheless appear to have confirmed that openness, or the absence of development, is an enduring feature of the southern part of the site. Combined with an understanding of coastal change over the past 1500 years, a compelling image is painted of the meeting between St Augustine and King Aethelberht as having occurred above a coastal inlet towards the southwest of a small settlement linked to the coast by a Roman track. That settlement was identified in excavations on an adjacent site, whilst the track has been confirmed as running through the northern field. This adds context to the account of the meeting provided by Bede, and despite change and modern sources of intrusion, the landscape remains open enough and retains enough physical clues for this time depth to be perceived. As this contributes to an understanding of historic context and sense of place, it positively contributes to contemplation of the event that the cross commemorates, and that pilgrims and other visitors come to celebrate.

(ii) Assessment

21. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the duty to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. Within this context the Framework notes that any harm to or loss of significance, including from development within its setting, should require clear and convincing justification. The standard and quality of evidence presented to support the proposed development, which both parties agree would give rise to harm, is a key consideration in this case, particularly given its outline nature.
22. The proposed development would effectively move the perceived edge of the settlement westwards to the railway embankment, absorbing the cross into the urban townscape of Cliffsend. This would have an obviously transformative effect

on the character of the site, and the immediate surroundings of the cross would no longer resemble those present when it was erected. More than this, the development would have a transformative effect in terms of place, formalising, defining and shaping the physical and visual setting of the cross. In thus moulding the way in which the cross and its setting were experienced, the development would also affect the ability to perceive and engage with the past, and therefore to contemplate the spiritual importance of the event that the cross commemorates.

23. Within this context the Heritage Impact Assessment (HIA) submitted in support of the scheme acknowledged design opportunities to strengthen understanding of the meaning the cross and its history. However, in seeking to categorise the meeting between St Augustine and King Aethelberht as 'folklore' and 'legend' it adopted a generally sceptical tone. This was not shared by the appellant's heritage witness, albeit he had no involvement at application stage. As the HIA was produced in advance of the archaeological excavations later conducted on site its appreciation of place and setting was not fully informed and was otherwise limited. Though the potential to replant a tree in the historic location of St Augustine's Oak was recognised, the contribution made by the setting of the cross to its significance was largely dismissed. Consequently, the approach taken in defining the parameters of the development was somewhat unenlightened, guided simply by drawing a circle around the cross labelled 'heritage conservation zone'.
24. Whilst a large proportion of this zone falls off-site, the approach appears arbitrary in the absence of any proper rationalisation grounded in an understanding and appreciation of place and setting. Aside from some uncertainty over its exact dimensions, the zone would not in any case see the exclusion of development. Though part of the zone falling within the southern part of the site would be largely retained as open space, the zone would include the main access into the northern part of the site, substantial widening of Cottington Road, as too other site access and drainage infrastructure, together with what some of the indicative plans show as visitor parking and play areas.
25. A failure to clearly demonstrate how acknowledged design opportunities could be taken in a way that would successfully integrate the cross, conserve its significance and sensitively shape the place runs through the appellant's evidence. Whilst the Design and Access Statement's consideration of heritage is brief and contains some notable errors, it physically excludes and makes no mention either of the cross or retained space in the section explaining how the adjacent 'character zone' could be treated. The lack of coherent vision is further underlined by the landscape visualisations provided to the inquiry which suggest that the space between the development and cross would be heavily planted in an apparent attempt to hide the development; a measure which would be unlikely to succeed, and which would also compromise the growth and appearance of the replanted oak tree.
26. Given the extent and modest dimensions of the open space retained between the cross and the development, it would inevitably be perceived as a subordinate component of the urban layout. This would be the case however it was landscaped. The adjoining plot containing the cross would be perceived in much the same way. The space would be strongly defined by the residential development which would abut its east side, and which, given its likely height and positioning on higher ground, would appear both physically and visually dominant. The ability to appreciate and engage with the time depth of the landscape setting would be severely compromised given that much would be obscured or effaced, as would

space for contemplation, given the significantly increased proximity of development and level of intrusion.

27. Scope to replant the oak tree represents a key opportunity, and the parties acknowledged that such a tree might in time become known as 'St Augustine's Oak'. It would thus presumably become a focus for pilgrimage. In this way such a tree could better reveal the significance of the cross by marking what was historically understood to have been the meeting place between St Augustine and King Aethelberht. However, though this could play an important role in helping to better define both place and setting, my findings above indicate that the quality of each would be harmed rather than enhanced by the development. In this regard, the proposal appears little more than a tokenistic gesture, its implications and broader importance having received little detailed consideration in advance of questioning at the inquiry.
28. Aside from the suggestion that the oak would form part of a belt of trees screening the development, and its incorrect positioning on the otherwise out-dated landscape plan submitted in support of the scheme, the tree would stand far closer to the development than the cross. Whilst scope for it to fully mature within the space available is unclear, as noted above, the indicative plans otherwise suggest that visitor parking would be provided close by. Retention of the tree would itself be secured for only 30 years as part the mandatory BNG requirements of the scheme, after which date its fate would be uncertain. Even with interpretation in place, the content of which remains similarly unknown, it would be challenging for any visitor to detach themselves from the overwhelmingly urban identity of the space within which the tree would stand, and relative to which it would appear progressively cramped as it grew. The tree could therefore be a relatively short-lived feature of the development which, whilst present, would serve to emphasise the poorly defined parameters of the scheme and the ill effects of failed place making. In this regard it would do very little to successfully enhance appreciation of the significance of the cross.
29. The appellant has additionally suggested that the route of the Roman track through the northern part of the site, which would be largely conserved unseen within the exclusion zone squeezed into the layout, would enhance appreciation of the significance of the cross. This was notwithstanding the appellant's general dismissal of the ability to engage with the historic time depth of the landscape within the site and its setting. Again, the archaeological evidence appears to indicate that the land between the road and the meeting place was largely open during the C6th. Though now severed by Cottington Road, the land again remains open, whereas it would be largely developed as part of the scheme. This would greatly limit the extent to which any visitor could in future connect the track with the cross and the oak or picture the landscape of which the track formed part, even with the assistance of 'innovative' interpretation – whatever that might be. It remains the case the retention of the track played no role in shaping the proposal or informing the parameters of the scheme given that it was only agreed between the parties mid-way through the inquiry.
30. The provision of 'safe routes' to the cross for visitors and parking have also been promoted as heritage benefits. I have however been provided with no evidence which indicates that access to the cross is unacceptably hazardous at present, and a layby already provides informal free parking directly adjacent. As the new routes would either run through the development, or along a 3-metre-wide

pedestrian/cycle way provided along Cottington Road, they would emphasise the urbanisation of the setting. Indeed, the route along Cottington Road would itself be provided alongside a carriageway widened to 5.5 metres, meaning that the cross would in future be viewed and accessed on the main approach from the east along an 8.5-metre-wide road corridor. This feature was conspicuously absent from the related landscape visualisation presented to the inquiry. I acknowledge that this heavily engineered solution was welcomed by the Highways Authority, notwithstanding the lack of existing context in either direction beyond the site. It would nonetheless represent a radical, and wholly insensitive treatment of the approach to the cross which, in combination with the similarly broad access proposed into the northern part of the site within the conservation zone, would serve to overwhelm a large part of its immediate setting with highways infrastructure. This would further exacerbate the adverse effects identified above.

31. Parking, as noted above, is also shown within the conservation zone close to the replanted oak. As access would be along what is labelled as a private drive on one plan, the extent to which the proposal and its deliverability were fully thought through is open to question. How this parking would be managed within a residential context and in coordination with English Heritage's management of the cross is also unknown. As an otherwise doubtful benefit, I have furthermore been presented with no means by which the provision of visitor parking space would be properly secured in clearance of the reserved matters.
32. In summary, and to the extent that it is relevant to this matter, the quality of evidence submitted to support the proposal is poor and the proposed parameters ill conceived, reflecting the lack of a detailed understanding of context, place and setting, and the role these play in the significance of the cross and its appreciation. This partly stems from a lack of proper front loading. Insofar as indicative proposals have been presented, these are tokenistic in their response, incoherent in terms of strategy and detail, and lacking in any clear vision or rationale. The scheme cannot as such be considered to have been 'heritage-led' as was asserted at the inquiry.
33. What amount to fundamental design failings cannot be properly addressed by imposition of conditions deferring their resolution to a later stage. Indeed, whilst the scheme may be outline, the provision of a masterplan and design principles document would not alter the parameters of the development, nor the limited scope they allow for variation. This is further underlined by reference to the Design and Access Statement within the proposed condition dealing with design principles, some of the shortcomings of which have been highlighted previously.
34. My findings above indicate the likelihood of highly adverse effects on both the significance of the cross and the ability to appreciate its significance. This can be characterised as an effect falling within the 'upper range' of less than substantial harm. In view of the expectations of statute, such harm attracts considerable importance and weight. In accordance with paragraph 215 of the Framework it is necessary to weigh this harm against the public benefits of the scheme.

(iii) Balance

35. Insofar as heritage benefits have been advanced in favour of the scheme, including the planting of an oak tree, I have assessed these above and attach no more than limited weight to them as considerations in favour of the scheme.

36. The scheme would be required to meet mandatory BNG standards. It would remain to be seen whether these were exceeded. However, whilst I observed parakeets during my site visit, it is highly improbable that hummingbirds and exotic butterflies would become future features of the site. Both are nonetheless depicted within the biodiversity section of the Design and Access Statement. Setting this somewhat fantastical vision aside, meeting mandatory BNG standards would constitute a generic benefit to which I attach limited weight.
37. Future occupants might make use of the very limited range of small-scale local services in Cliffsend. This might in turn help to support local vitality. Any potential contribution would however be constrained by the capacity of the services in question to cater for new business, which appears unlikely to be significant. On that basis I attach limited weight to the related benefits.
38. It is claimed that the scheme would improve the edge of Cliffsend. However, as already established, the edge would more or less by default become that of the existing railway embankment which would become an abrupt point of transition. This would not represent any obvious improvement and is not therefore a consideration to which I attach any weight.
39. The S106 would secure a number of contributions which would see the public footpath through the site upgraded and a toilet amongst other unspecified improvements provided at the village hall. However, in the absence of the development there would be no inherent need to upgrade the footpath, and whilst as a section off-site has been blocked by fly tipped garden waste, other powers exist to address this. The extent to which the works might otherwise assist in improving access to the railway station is unclear. The distance that residents within the broader area would still need to walk to get there could remain off putting. Improvements to the village hall would presumably also be of some broader benefit, but the need for improvement would reflect the larger population that the facility would be expected to service. This would be similarly true of other contributions secured by the S106 in relation to education and health. Whilst the S106 would also secure provision of on-site public open space and play areas, aside from that provided adjacent to the cross, it appears unlikely that these facilities would see much use by non-residents. The above considerations therefore attract no more than limited weight.
40. Characterised as falling within the 'small and medium site' category by the appellant, the development has been chiefly promoted on the basis of the social and economic benefits that would be generated by provision of market and affordable housing within an accessible location. This would help to address a pressing local need for each. Within that context, subject to the development later being shown to be deliverable, it could also make a numerically important contribution towards addressing the persistent shortfall in the Council's 5YHLS noted above. Given the national objective of significantly boosting the supply of new homes, I attach significant weight to the benefits.
41. Within this context the appellant has placed heavy emphasis on the 12 December 2024 Written Ministerial Statement (WMS), which set out the Government's goal of delivering 1.5 million new homes. However, whilst the WMS's criticism of inadequate local plan coverage might well be applicable to the Council, the WMS also sought to make absolutely clear that the measures it outlined were not a green light for low-quality development. Nor did it accept that there is an inherent trade-off

between supply and quality. In this regard I cannot ignore the design failings of the scheme. As emphasised out by the Framework, good design is a key aspect of sustainable development. It follows that poorly designed development is not publicly beneficial. It remains the case that the benefits of housing provision could be similarly generated by a more well informed and sensitive scheme.

42. Indeed, as beneficial as the development might be in a quantitative sense, even if the shortfall in 5YHLS is as low as is claimed by the appellant, I am satisfied that the collective weight of the above benefits would not outweigh or serve to convincingly justify the harm likely to be caused to the significance of the cross as a listed building and designated heritage asset.
43. For the reasons outlined above I conclude that the appellant has failed to demonstrate that the development could be delivered without causing unacceptable harm to the significance of St Augustine's Cross. The development would as such fail to preserve its setting, conflicting with Policy HE03 of the Local Plan which generally defers to the Framework. Though Policy SP36 of the Local Plan, which was also cited by the Council, sets out a list of actions rather than criteria against which to assess a scheme, the development would also frustrate the objective it sets out of protecting the historic environment from inappropriate development.

(b) Landscape

44. Policy SP26 of the Local Plan generally seeks to secure development proposals that conserve and enhance Thanet's local distinctiveness. It states that development proposals should demonstrate how they respect and respond to the character, key sensitivities, qualities and guidelines of the relevant landscape character area as detailed in the Thanet Landscape Character Assessment Supplementary Planning Document (the SPD). The supporting text usefully explains that the policy aims to safeguard and enhance the open and historic character of Thanet's countryside and landscape. Some overlap therefore exists between this matter and that considered above.
45. The site falls within the locally identified Watsum North Slopes Landscape Character Area (the LCA). This is large in size, and is defined and named with reference to the former Watsum Channel which historically lay towards the south. The Thanet Landscape Character Assessment Supplementary Planning Document (the SPD), notes that the landscape holds strong cultural associations, including links to the historical landing sites of St Augustine in the adjacent Pegwell Bay Landscape Character Area. Within this context it further notes St Augustine's Cross amongst the key characteristics of the LCA, and lists conservation and enhancement of cultural heritage and assets, including their landscape setting, as one of the guidelines intended to deliver the landscape strategy for the LCA. Insofar as the subdivision of character areas was strongly influenced by historic geography, they serve to further underline the time depth which both exists, and which remains capable of perception within the modern landscape.
46. As set out above, the site is well enclosed. Visual linkage between it and the broader landscape of the LCA is limited, being principally constrained by the railway embankment. This does not however alter the fact that the site hosts a feature identified amongst the LCA's key characteristics. Nor does the otherwise 'ordinary' character of the fields which make up the site. Moreover, the noted links between the LCA and Pegwell Bay Landscape Character Area are only superficially

obscured by the overgrown hedge along the southern edge of the site. It appears that this linkage would be more visually apparent were the hedge simply trimmed, particularly in winter.

47. The cross would clearly continue to exist post-development. But given that it would be absorbed within the urban area of Cliffsend, it would thereafter be viewed as a feature of the townscape rather than the landscape. Though the conservation zone drawn around the cross was additionally intended to serve as a landscape buffer and component of an improved settlement edge, for many of the reasons already explored above, it would be ineffective, being a relatively small, urbanised space providing little sense of landscape context. Similar would be true of the bands of open space provided around the peripheries of the site.
48. Whilst perception of the effects of the development beyond the boundaries of the site and from within the broader LCA would be limited, the quality of the contribution made by the site to the wider LCA would be substantially diminished. This would include erosion of the noted linkage between the LCA and Pegwell Bay Landscape Character Area. The development would not therefore respect and respond to the character, key sensitivities, qualities and guidelines of the LCA set out within the SPD, or conserve and enhance Thanet's local distinctiveness.
49. In such circumstances Policy SP26 provides an exception for development proposals essential for the social and economic well-being of the area. Generally speaking, provision of housing is essential, it is required locally, and it contributes to social and economic well-being. However, considered in such a simplistic way the exception would render the policy both largely ineffective. Indeed, insofar as the policy wording identifies the 'proposal', it is apparent that whilst all the above may be generally true of housing, there is no essential need either to provide it on the site or in accordance with the parameters proposed. As such, I cannot conclude that the scheme before me passes the exception. The development would therefore conflict with Policy SP26.
50. For the reasons outlined above I conclude that the appellant has failed to demonstrate that the development could be delivered without causing unacceptable harm to the LCA. It would therefore conflict with Policy SP26 of the Local Plan as set out above, and Policy QD02 of the Local Plan whose headline objective is for all new development to promote or reinforce the local character of the area.

Other Matters/Considerations

51. The appellant has referenced a press release indicating that housing developments near railway stations will in future be given a 'default yes'. But the details of such a measure, if introduced, remain unclear, and have yet to be consulted on, let alone adopted. I cannot therefore attach any weight to this as a consideration in favour of the scheme.
52. The development would have a likely significant effect on the integrity of the Thanet Coast and Sandwich Bay Special Protection Area given increased recreational pressure. To this end the submitted S106 would secure a contribution towards delivery of the Council's Strategic Access, Management and Monitoring Plan. Had I been otherwise minded to allow the appeal this would have been a matter requiring further attention. However, as I am dismissing it for other reasons no further consideration is necessary.

Conclusion

53. For the reasons set out above the effects of the development would be unacceptable, giving rise to conflict with the development plan taken as a whole. There are no other considerations which alter or outweigh these findings. I therefore conclude that the appeal should be dismissed.

Benjamin Webb

INSPECTOR

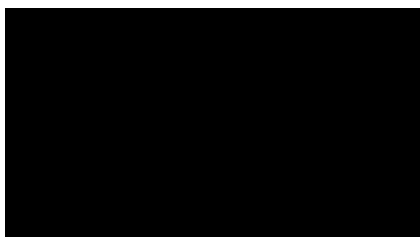
APPEARANCES

For the Appellant



Lead Counsel for the appellant, King's Chambers
Counsel for the appellant, King's Chambers

She called:



(Heritage) TCMS
(Landscape) Tyler Grange
(Housing Land Supply) Emery Planning
(Planning) Lichfields

Other contributions:



(Legal) Richborough

For the Local Planning Authority



Counsel for the LPA, Francis Taylor Building

He called:



(Heritage) Bridges Associates
(Planning/character and appearance) VLH Associates
(Housing land supply) Thanet DC

Other contributions:

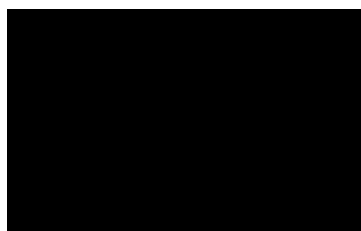


Thanet DC

Interested Parties



Westgate and Garlinge Action Group Against
Housing Development on Farmland



Former local resident
Cliffsend Parish Councillor
Parish and District Councillor
Parish and District Councillor

INQUIRY DOCUMENTS

ID1. Appellant opening.

ID2. LPA opening.

ID3. Scott schedule of disputed 5YHLS sites.

ID4. Draft agenda for housing land supply round table.

ID5. Interested party photos of Foads Hill.

ID6. Landscape SOCG.

ID7. Heritage SOCG.

ID8. Decision notice OL/TH/18/0261

ID9. Archaeology SOCG.

ID10. Archaeology exclusion zone plan.

ID11. Illustrative site layout plan Ref. SL - 01 B Rev. 9.

ID12. Draft S106 (12 Nov).

ID13. Schedule of conditions (13 Nov).

ID14. Schedule of conditions (20 Nov).

ID15. Draft S106 - clean (20 Nov).

ID16. Draft S106 – track changes (20 Nov).

ID17. Schedule of conditions (21 Nov).

ID18. LPA closing

ID19. Appellant closing.